

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Service Rules for the 698-746, 747-762)	WT Docket No. 06-150
and 777-792 MHz Bands)	
)	
Revision of the Commission's Rules to Ensure)	CC Docket No. 94-102
Compatibility with Enhanced 911 Emergency)	
Calling Systems)	
)	
Section 68.4(a) of the Commission's Rules)	WT Docket No. 01-309
Governing Hearing Aid-Compatible)	
Telephones)	
)	WT Docket No. 03-264
Biennial Regulatory Review – Amendment of)	
Parts 1, 22, 24, 27, and 90 to Streamline and)	
Harmonize Various Rules Affecting Wireless)	
Radio Services)	
)	WT Docket No. 06-169
Former Nextel Communications, Inc.)	
Upper 700 MHz Guard Band)	
Licenses and Revisions to Part 27 of)	
the Commission's Rules)	
)	PS Docket No. 06-229
Implementing a Nationwide,)	
Broadband, Interoperable Public)	
Safety Network in the 700 MHz)	
Band)	WT Docket No. 96-86
)	
Development of Operational, Technical and)	
Spectrum Requirements for Meeting Federal,)	
State and Local Public Safety		
Communications Requirements Through the		
Year 2010		

COMMENTS OF REGION 12 (IDAHO),

700 MHZ REGIONAL PLANNING COMMITTEE

Region 12 hereby submits these comments in response to the Commission's *Further Notice of Proposed Rulemaking* in the above-captioned proceedings.

First, we believe that the Regional Planning Committees (RPCs) should be given the flexibility to determine the best way to meet the broadband and wideband needs of local agencies within their regions. More than half of the counties (24 of 44) in Region 12 have a population density of fewer than 10 people per square mile. The state's total population density is estimated at 15.6 people per square mile.¹ Further, analysis shows that approximately half of the United States has a population density of fewer than 10 people per square mile. There are clearly areas within Region 12 and many other parts of the country that will not provide any incentive for a nationwide broadband build out. We should have the flexibility in those areas to deploy wideband solutions as is currently being done in Post Falls, Idaho, and the Idaho State Police high-performance data (HPD) system. The proposed broadband build out is estimated by a number of parties to take up to ten years. When has a project of this magnitude ever been completed on time? Lacking the flexibility of allowing broadband solutions in Region 12 would severely hamper efforts to take the best advantage of the available spectrum.

Second, Region 12 is opposed to relocating or restructuring any of the narrowband voice channels in 700 MHz that have already been established for public safety. Though there is no dispute it would take more time and effort for Region 12 to amend its plan to reflect such changes, the larger concern centers on the costs and disruptions for agencies that have already programmed and tuned their systems for those already-designated narrowband frequencies. Region 12 developed its plan based on allocations set by the Commission, and systems were thereafter designed accordingly. Within Region 12 are agencies whose systems are licensed and operational at these frequencies. These agencies provide public safety services for approximately

¹ U.S. Census Bureau State & County QuickFacts: <http://quickfacts.census.gov/qfd/states/16000.html>

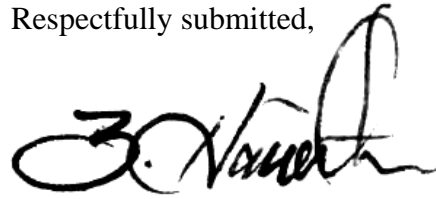
38% of the Region's population, and more agencies have obtained engineering studies as they move toward purchase and installation of 700 MHz radio systems.

Recommendations to the Commission to change these allotments should have come years ago, not now that plans have been approved and systems are already operational. The suggestions from some that costs will be low if done right away does not take a realistic view of the number of systems and subscriber units already manufactured and deployed, not just in Region 12, but across the country. The cost of these systems and the associated subscriber units is already more than many agencies can bear, and many in Region 12 have had to rely on diminishing grant funds to purchase equipment that allows them to begin using their systems. To ask them to take on the additional burden brought on by these suggested changes would be much more than an inconvenience. The additional cost would certainly strain already tight budgets, and cause our citizens to ask why they are being required to fund a change of this magnitude this late in the process.

Many years of work by the Commission and the 700 MHz Public Safety National Coordination Committee (NCC) were later built upon by the Regional Planning Committees. Region 12 believes it would be counterproductive to reverse all of the hard work that has been done through the realignment of the narrow band channels, and restricting all regions to a broadband-only strategy. Many previous commenters from the public-safety sector have shown support for a wideband-broadband solution.

Region 12 urges the Commission to consider a way to meet the goals of interoperability without mandating a single technology, and limiting the spectrum to only a nationwide network. Methods could be developed through market requirements or FCC rules that could interface wideband units with broadband technology as part of a nationwide public safety broadband system. Another consideration would be to set aside some of the current wideband spectrum for local wideband use, while dedicating another portion for nationwide broadband use.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "B. Hamilton", with a large, stylized flourish at the end.

Bart Hamilton, Chairperson
Region 12 (Idaho)
700 MHz Regional Planning Committee

May 22, 2007